

From: Sanga, Ravi <Sanga.Ravi@epa.gov>
Sent: Wednesday, June 28, 2023 3:43 PM
To: Sanga, Ravi <Sanga.Ravi@epa.gov>
Subject: FW: NRRB comments/responses for East Waterway
From: Grandinetti, Cami <Grandinetti.Cami@epa.gov>
Sent: Tuesday, May 21, 2019 11:00 AM
To: Ammon, Doug <Ammon.Doug@epa.gov>; Poore, Christine <Poore.Christine@epa.gov>
Cc: Blocker, Shawn <Blocker.Shawn@epa.gov>; Sanga, Ravi <Sanga.Ravi@epa.gov>
Subject: NRRB comments/responses for East Waterway

Hello Doug and Christine—Attached to this email are Region 10's responses to the NRRB comments for the East Waterway Operable Unit of the Harbor Island superfund site. I was not completely clear on how these are getting resolved or handled with the changes on NRRB but I figure you two must be at least part of this process.

If you could let me know you've received these and what you think the path forward looks like, that would be great. One issue we have is over whether the remedy is Interim or Final. I'll quickly try to summarize this so that you can quickly get background on the most difficult issue I think we had with the NRRB comments. If it's an interim remedy, we don't need a cleanup level. If it's final, we need a cleanup level. According to the state ARAR, the cleanup level needs to be set at one of the following: lowest risk based number, pql, natural background. For this site, the natural background number is highest—so that is the number we picked. The ARAR does allow for one to adjust the CUL upward to no higher than the regional background number. For this site, the State of Washington is conducting source control work and evaluating the upper watershed—with the goal to identify an appropriate regional background number. They expect that process to take several years. At this time, the region prefers identifying a final remedy—selecting the natural background CUL and then adjusting to regional background when that number is known. This process is consistent with the remedy—which doesn't require any action other than monitoring at the CUL (recall that cap or dredge actions are triggered at a sediment number roughly two orders of magnitude greater than the proposed CUL).

I look forward to hearing from you and let me know if you have any questions.

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